

PRC Environmental Management, Inc.  
644 Linn Street  
Suite 719  
Cincinnati, Ohio 45203  
513-241-0149  
Fax 513-241-0354

August 12, 1994

**R E C E I V E D**  
AUG 16 1994

**SITE ASSESSMENT SECTION**

**PRC**

Ms. Jeanne Griffin  
Work Assignment Manager  
U.S. Environmental Protection Agency  
Region 5 (HSM-5j)  
77 W. Jackson Boulevard  
Chicago, IL 60604

US EPA RECORDS CENTER REGION 5



469071

**Subject:      Transportation and Disposal of Investigation-Derived Wastes (IDW) from the  
Systech Liquid Treatment Corporation (Systech) (OHD 030 935 852) and  
Chemical Leaman Tank Lines, Inc. (CL), (OHD 046 618 014) sites.**

Dear Ms. Griffin:

On behalf of the U.S. Environmental Protection Agency (EPA), PRC Environmental Management, Inc. (PRC) subcontracted Republic Environmental Systems (Republic) to dispose of nineteen 55-gallon drums containing non-hazardous IDW from the Systech site in Franklin, Ohio and the CL site in Ross, Ohio. This non-hazardous IDW consisted of soil from drill cuttings, purged groundwater, and decontamination water generated during expanded site inspection (ESI) activities that included monitoring well installation and groundwater and soil sampling. PRC observed Republic collect samples of the drummed IDW on June 16 and June 17, 1994, and pick up the drums on August 3, 1994, from both sites. PRC's observations are discussed below. Photographs taken during both site visits are included in Enclosure 1. The non-hazardous waste manifests, Republic's work order sheets, and chain-of-custody records for the Systech and CL sites are included in Enclosure 2.

**June 16, 1994**

PRC (Tom Schaffner) met with Republic's Jack Jaspers at the CL site to collect fingerprint samples of drill cuttings, decontamination water, and purged groundwater from the drums. The fingerprint samples were used to determine whether the waste materials could be transported and disposed of as non-hazardous waste.

Ms. Jeanne Griffin  
August 12, 1994  
Page 2

Ten drums were located on site, including six drums of soil, two drums of purged groundwater, and two drums of decontamination water. Soil samples were collected from each soil storage drum and composited into one sample (see Photograph Nos. 1 and 2). Water was collected from each purged groundwater storage drum and composited into one sample (see Photograph No. 3). Water was also collected from each decontamination water storage drum and composited into one sample (see Photograph No. 4). Each composite sample was placed directly into a 1-pint glass jar and taken with Republic to be submitted for analysis (see Photograph No. 5).

#### **June 17, 1994**

PRC (Tom Schaffner) met with Republic's Jack Jaspers at the Systech site to collect fingerprint samples from drums of purged groundwater generated during ESI monitoring well sampling. Nine drums were located on site, six of which contained purged groundwater. These six drums were the only drums sampled because one of the other drums contained less than 6 inches of water and the other two were empty. Purged groundwater samples were collected from each of the six drums and composited into one sample (see Photograph Nos. 6 and 7). The composite water sample was then placed into a 1-pint glass jar and taken with Republic to be submitted for analysis.

#### **August 3, 1994**

PRC (Stan Lynn) met with Republic's Jerry Phillips at the Systech site to oversee drum pick up and transfer to Ecolotec, Inc. (Ecolotec), (EPA ID No. OHD 980 700 942) in Dayton, Ohio for disposal. Although the contents were non-hazardous, all six drums of purged groundwater required overpacking due to their weathered condition. After overpacking, the drums were labelled non-hazardous and marked with the proper identification number (EC13999) as listed on the non-hazardous waste manifest (Enclosure 2) (see Photograph Nos. 8 and 9). The three remaining empty drums were also

Ms. Jeanne Griffin  
August 12, 1994  
Page 3

labelled non-hazardous, marked with the proper identification number (EC14008), and loaded onto Republic's truck.

PRC and Republic then left the Systech site, and proceeded to Ross, Ohio to pick up the drums of IDW at the CL site. One drum of purged groundwater at the CL site required overpacking. All of Republic's overpack drums were used at the Systech site, so Republic used a salvage drum (the type used to store spill cleanup material) to overpack the drum of purged groundwater at the CL site (see Photograph No. 10). All drums of purged groundwater and decontamination water were then labelled non-hazardous and marked with the proper identification number (EC14000). The drums of soil were also labelled non-hazardous and marked with the proper identification number (EC13998). Republic then transported the 10 drums from the CL site, and the six drums from the Systech site to Ecolotec in Dayton, Ohio for disposal.

If you have any questions or comments, please call me at (513) 241-0149.

Sincerely,

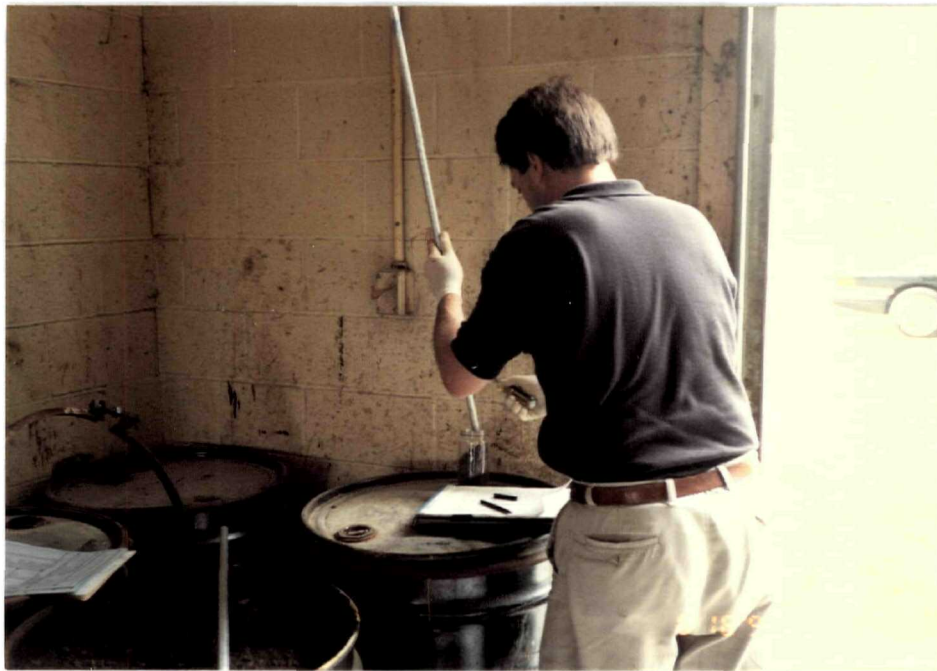
A handwritten signature in black ink, appearing to read 'Gabriel Rood', written in a cursive style.

Gabriel Rood  
Project Manager

Enclosures (2)

cc: Stan Lynn - PRC Geologist

**ENCLOSURE 1**  
**PHOTOGRAPHIC LOG**  
(Five Pages)



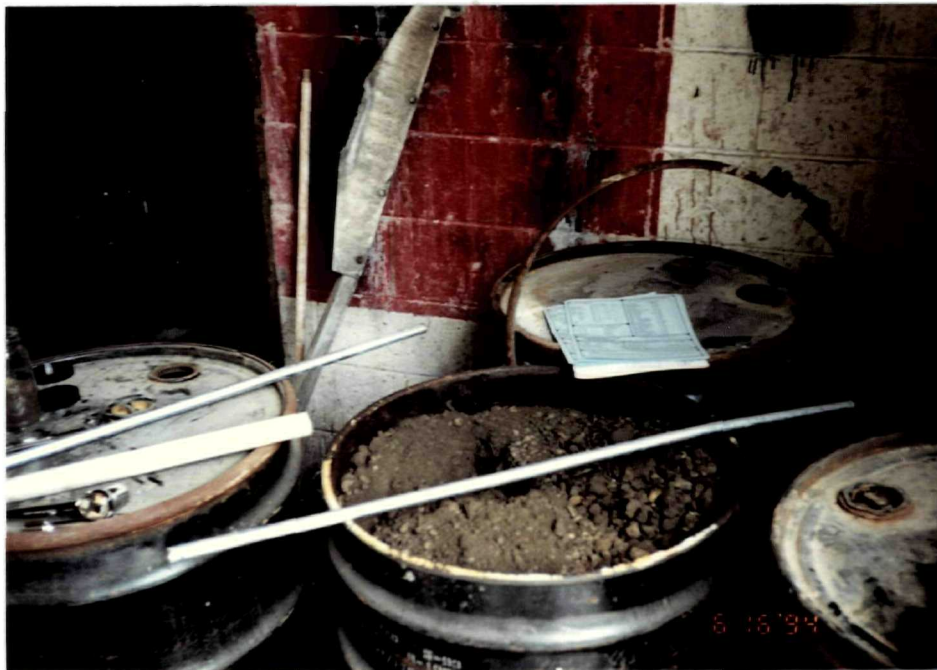
Photograph No. 1

Location: Tank cleaning building at CL site

Orientation: Southwest

Date: June 16, 1994

Description: Republic personnel transferring soil from a drum into a 1-pint glass jar.



Photograph No. 2

Location: Tank cleaning building at CL site

Orientation: Southeast

Date: June 16, 1994

Description: Sampling probe used to collect soil from drums located in background.



Photograph No. 3

Location: Monitoring well MW-2 at the CL site

Orientation: South

Date: June 16, 1994

Description: Republic personnel collecting a purged groundwater sample.



Photograph No. 4

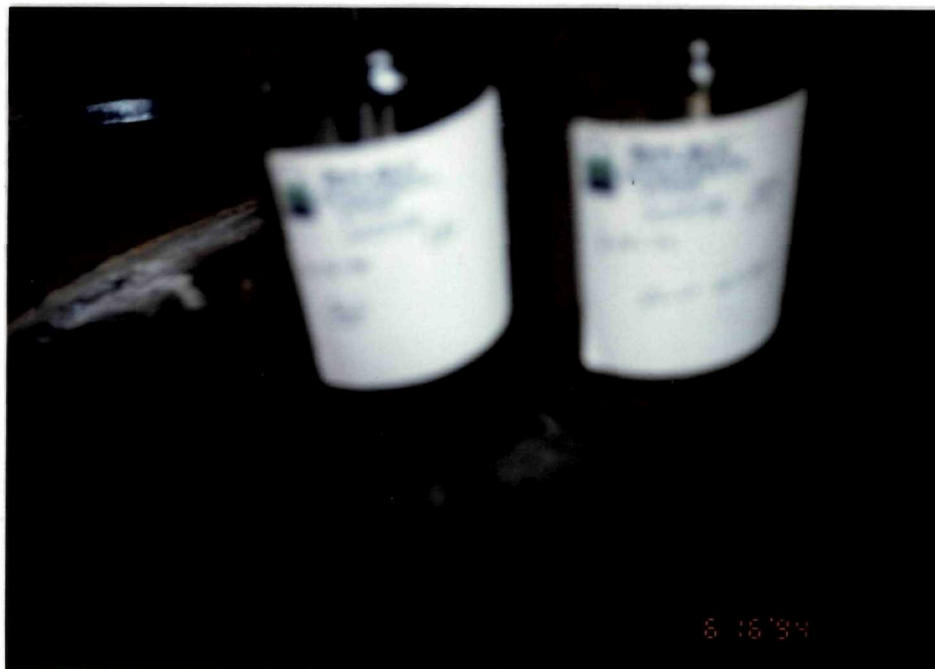
Location: Tank cleaning building at CL site

Orientation: Southeast

Date: June 16, 1994

Description: Republic personnel collecting a decontamination water sample.





Photograph No. 5

Location: Tank cleaning building at CL site

Orientation: West

Date: June 16, 1994

Description: Two of the 1-pint glass jars containing soil and water collected from drums at the CL site.



Photograph No. 6

Location: Loading dock at Systech site

Orientation: Northeast

Date: June 17, 1994

Description: Republic personnel transferring purged groundwater from a drum into a 1-pint glass jar.



Photograph No. 7

Location: Loading ramp at Systech site

Orientation: North

Date: June 17, 1994

Description: Republic personnel transferring purged groundwater from a drum into a 1-pint glass jar.



Photograph No. 8

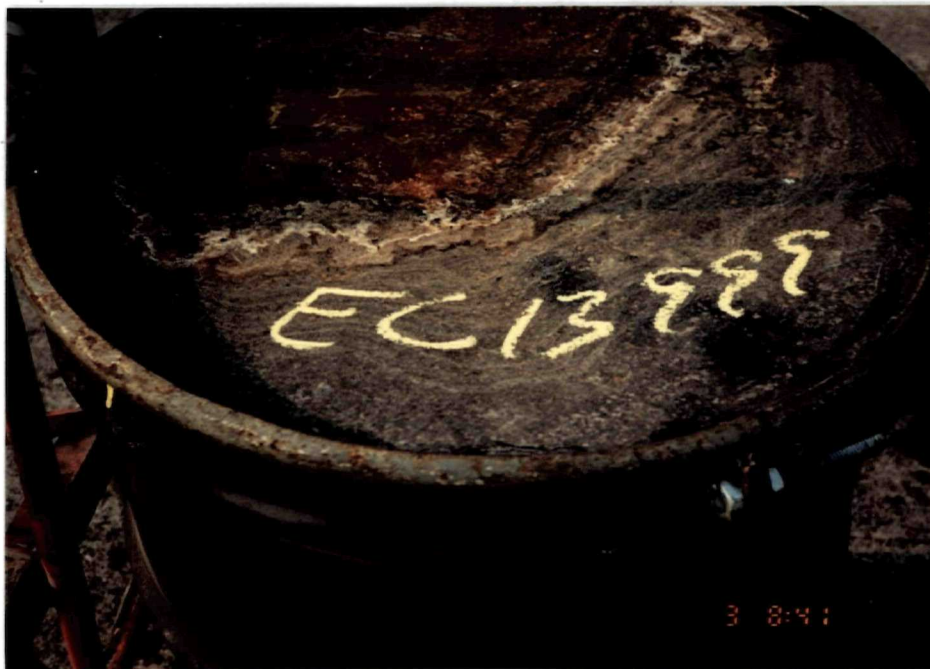
Location: Loading dock at Systech site

Orientation: Southwest

Date: August 3, 1994

Description: Drum with non-hazardous sticker in foreground. Republic's truck in the background.





Photograph No. 9

Location: Loading dock at Systech site

Orientation: N/A

Date: August 3, 1994

Description: Drum lid marked with non-hazardous waste manifest identification number.



Photograph No. 10

Location: East side of tank cleaning building at the CL site

Orientation: East

Date: August 3, 1994

Description: Bulging drum that required overpacking in foreground. Salvage drum in the background.

**ENCLOSURE 2**

**NON-HAZARDOUS WASTE MANIFESTS, REPUBLIC'S WORK ORDER SHEETS, AND  
CHAIN-OF-CUSTODY RECORDS**

**(Six Pages)**

**NON-HAZARDOUS  
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest  
Document No.

59222

2. Page 1  
of 1

3. Generator's Name and Mailing Address  
**US EPA REGION 5  
77 WEST JACKSON BLVD.  
CHICAGO, IL 60604**

4. Generator's Phone ( **312** ) **886-3007**

5. Transporter 1 Company Name

**REFUELIC ENV SYS (TRANS GROUP)**

6. US EPA ID Number

**PAD982661381**

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

**ECOLOTEC, INC.  
636 N. IRWIN STREET  
DAYTON, OH 45403**

10. US EPA ID Number

**OH D980700942**

A. Transporter's Phone **215-997-9111**

B. Transporter's Phone

C. Facility's Phone

**513-254-9990**

11. Waste Shipping Name and Description

a. **NON HAZARDOUS RCRA EMPTY CONTAINERS  
NON REGULATED**

b. **NON HAZARDOUS LIQUID  
NON REGULATED**

c.

d.

D. Additional Descriptions for Materials Listed Above

a) **EC14008**  
b) **EC13999**

E. Handling Codes for Wastes Listed Above

a) **S01**  
b) **S01**

15. Special Handling Instructions and Additional Information

**SITE ADDRESS:**

**SYSTECH, FRANKLIN, OH**

**24 HOUR EMERGENCY PHONE**

16. **GENERATOR'S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

**JEANNE GRIFFIN**

Signature

*Jeanne Griffin*

Month Day Year

**07/21/94**

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

**TERRY R. PHILLIPS**

Signature

*Terry R. Phillips*

Month Day Year

**07/21/94**

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

Month Day Year

**GENERATOR'S COPY**

124BLS-C5 Rev 9/92

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No. 59223		2. Page 1 of 1	
3. Generator's Name and Mailing Address US EPA REGION 5 77 WEST JACKSON BLVD. CHICAGO, IL 60604		4. Generator's Phone ( ) 312 886-3007		5. Transporter 1 Company Name REPUBLIC ENV SYS (TRANS GROUP)		6. US EPA ID Number P A D 9 8 2 6 6 1 3 8 1	
9. Designated Facility Name and Site Address ECOLYTEC, INC. 636 N. IRWIN STREET DAYTON, OH 45403		10. US EPA ID Number		A. Transporter's Phone 215-997-9111		B. Transporter's Phone	
				C. Facility's Phone		513-254-9990	
11. Waste Shipping Name and Description NON HAZARDOUS SOIL, NON REGULATED		12. Containers No. Type		13. Total Quantity		14. Wt/Vol Unit	
a. NON HAZARDOUS SOIL, NON REGULATED		004 D M 04500 P					
b. NON HAZARDOUS LIQUID, NON REGULATED		004 D M 04500 C					
c.							
d.							
D. Additional Descriptions for Materials Listed Above a) EC13998 b) EC14000		E. Handling Codes for Wastes Listed Above a) S01 b) S01					
15. Special Handling Instructions and Additional Information CHEMICAL LEAKMAN - ROSS, OH 24 HOUR EMERGENCY PHONE							
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.							
Printed/Typed Name JANNE GRIFFIN		Signature		Month Day Year 07/21/94			
Printed/Typed Name TERRY R. PHILLIPS		Signature		Month Day Year 08/03/94			
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year			
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year			
19. Discrepancy Indication Space		Printed/Typed Name		Signature		Month Day Year	
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 19.		Printed/Typed Name		Signature		Month Day Year	

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# REPUBLIC ENVIRONMENTAL SYSTEMS

## (TRANSPORTATION GROUP) INC.

21 CHURCH RD., HATFIELD, PA 19440

(513) 254-2346 FAX (513) 254-6728

### WORK ORDER

No 8017

SHIPPER/GENERATOR  <i>US EPA SITE</i>	DATE OF P/U <i>5-3-94</i>	ADDITIONAL DOCUMENTS (B/L & MANIFESTS)  <i>59222</i>
	TRACTOR # <i>300</i>	
	TRAILER #	
	BOX SPOTTED #	
LOADING LOCATION CITY <i>FRANKLIN</i> STATE <i>OH.</i>	BOX PICKED UP #	
LOAD DESCRIPTION <i>P/U DRUMS OVERPACK 6 DRUMS 3 EMPT. DRUMS</i>	O/P'S	LINER
	QUANTITY	VOLUME

APPOINTMENT TIME <i>8:00</i>	REASON FOR DELAY (as much detail as possible)
ARRIVAL @ GENERATOR <i>7:45</i>	
DEPART GENERATOR <i>9:45</i>	
DELAY TIME	
GENERATOR SIGNATURE <i>X</i> <i>PROV</i>	<i>ON BEHALF OF US EPA</i> DATE <i>8/3/94</i>

DISPOSAL FACILITY INFORMATION (FACILITY NAME)  <i>ECOLOGICAL</i>	ADDITIONAL EQUIPMENT/COMMENTS
FACILITY LOCATION	
CITY <i>DAYTON</i> STATE <i>OH.</i>	

REASON FOR DELAY (as much detail as possible)	
ARRIVAL TIME:	
DEPARTURE TIME:	
DELAY TIME:	
FINISH TIME:	

TSDF REPRESENTATIVE SIGNATURE _____	DATE _____
DRIVER PRINT _____ DRIVER SIGN <i>J. M. Phillips</i>	DATE <i>5-3-94</i>

BILLING INFORMATION (OFFICE USE ONLY)	
CUSTOMER _____	P.O. # _____
TRANSPORTATION PRICE _____	SPOTTING CHARGE: _____ CITY _____
GENERATOR DELAY: _____	hrs. @ _____ = _____
DISPOSAL DELAY: _____	hrs. @ _____ = _____
ADDITIONAL BILLING INFO: _____	
TOTAL -	

WHITE: BILLING      YELLOW: OFFICE      PINK: GENERATOR



# REPUBLIC ENVIRONMENTAL SYSTEMS (TRANSPORTATION GROUP) INC.

21 CHURCH RD., HATFIELD, PA 19440  
(513) 254-2346 FAX (513) 254-6728

WORK ORDER  
No 8017

SHIPPER/GENERATOR  <i>US EPA SITE</i>		DATE OF P/U <i>8-3-94</i>		ADDITIONAL DOCUMENTS (B/L & MANIFESTS)  <i>59223</i>	
		TRACTOR # <i>300</i>			
		TRAILER #			
		BOX SPOTTED #			
LOADING LOCATION CITY <i>ROSS</i> STATE <i>OH.</i>		BOX PICKED UP #			
LOAD DESCRIPTION <i>1 1/4 DRUMS OVERPACK 1 DRUM</i>		O/P'S		LINER	
		QUANTITY		VOLUME	
APPOINTMENT TIME		REASON FOR DELAY (as much detail as possible)			
ARRIVAL @ GENERATOR <i>1045</i>					
DEPART GENERATOR <i>140</i>					
DELAY TIME					
GENERATOR SIGNATURE <i>ON BEHALF OF U.S. EPA [Signature]</i>		DATE <i>8/3/94</i>			
DISPOSAL FACILITY INFORMATION (FACILITY NAME) <i>Ecolotec</i>		ADDITIONAL EQUIPMENT/COMMENTS			
FACILITY LOCATION					
CITY <i>DAYTON</i> STATE <i>OH.</i>					
ARRIVAL TIME:		REASON FOR DELAY (as much detail as possible)			
DEPARTURE TIME:					
DELAY TIME:					
FINISH TIME:					
TSDF REPRESENTATIVE SIGNATURE		DATE			
DRIVER PRINT		DRIVER SIGN <i>[Signature]</i>		DATE <i>8-3-94</i>	
BILLING INFORMATION (OFFICE USE ONLY)					
CUSTOMER		P.O. #			
TRANSPORTATION PRICE		SPOTTING CHARGE:		CITY	
GENERATOR DELAY:		hrs. @		=	
DISPOSAL DELAY:		hrs. @		=	
ADDITIONAL BILLING INFO:					
TOTAL -					

WHITE: BILLING      YELLOW: OFFICE      PINK: GENERATOR



# REPUBLIC ENVIRONMENTAL SYSTEMS

## CHAIN-OF-CUSTODY RECORD AND CERTIFICATION OF REPRESENTATIVE SAMPLING

0010

REPUBLIC ENVIRONMENTAL SYSTEMS (OHIO) INC.	716 NORTH IRWIN	P.O. BOX 175	DAYTON, OHIO 45404	(513) 254-9990	FAX: (513) 254-3323
REPUBLIC ENVIRONMENTAL SYSTEMS (CLEVELAND) INC. (EVERGREEN ENVIRONMENTAL GROUP, INC.)	33 INDUSTRY DRIVE		BEDFORD, OHIO 44146	(216) 786-7800	FAX: (216) 786-8200

PROJECT NAME <i>Systech</i>		PROJECT LOCATION <i>Franklin, Oh</i>				ANALYSIS DESIRED (Indicate Separate Containers)		<div style="display: flex; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">Fingerprint</div> <div style="border: 1px solid black; width: 40px; height: 40px; margin: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 40px; margin: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 40px; margin: 2px;"></div> <div style="border: 1px solid black; width: 40px; height: 40px; margin: 2px;"></div> </div>				
PROJECT NO.		PROJECT CONTACT <i>Gabs Road</i>										
CLIENT REPRESENTATIVE <i>Jack Jaspers</i>		PROJECT MANAGER/SUPERVISOR										

ITEM NO.	SAMPLE LABEL	DATE	TIME	C O M P	G R A B	SAMPLE DESC. (Incl. Source)	SAMPLING EQUIPMENT	# OF SAMP.	CONT. TYPE/ VOLUME						REMARKS
1.	<i>Plc 241-25</i>	<i>6-17-94</i>	<i>10:00am</i>	<i>X</i>		<i>Groundwater</i>	<i>hand</i>	<i>2</i>	<i>1 pl</i>	<i>X</i>					<i>6-17-94</i>
2.															
3.															

**GENERAL DIRECTIONS:** In order to determine whether we can accept the special waste described in the above numbered profile sheet, we must obtain a representative sample of the waste. We will analyze the sample to verify the information you have provided us, so it is particularly important that the sample be truly representative. In most circumstances, you will be obtaining the sample. However, in those cases in which we obtain the sample, we must ask that one of your employees be present to direct the particular source to be sampled and to witness the sampling. In such case, your employee must sign this certification as a witness.

I undersigned certifies that he/she obtained a representative sample of the waste material described in the Generator's Waste Material Profile Sheet above referenced and that the following representations are true and correct.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Witnessed By:

I hereby authorize Republic Environmental Systems, Inc. to make appropriate adjustments to the Waste Characterization Report.

\_\_\_\_\_  
Signature

I hereby authorize Republic Environmental Systems, Inc. to process my sample(s) and Waste Characterization Report(s) and bill my company \$ 100.00 per sample per WCR submitted. This fee represents the administrative and technical review process associated with the waste approval. It does not represent analytical fees necessary for waste identification or classification.

\_\_\_\_\_  
Signature

TRANS. NO.	TRANSFERS RELINQUISHED BY:	DATE	TIME	TRANSFERS ACCEPTED BY:	DATE	TIME
1.	<i>Tom Schaffner</i>	<i>6-17-94</i>	<i>10:00am</i>	<i>Jack Jaspers</i>	<i>6-17-94</i>	<i>10:00am</i>
2.						
3.						

Billing Address: \_\_\_\_\_

Broker/Invoicing: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Authorized Personnel: \_\_\_\_\_



**REPUBLIC  
ENVIRONMENTAL  
SYSTEMS**

CHAIN-OF-CUSTODY RECORD  
AND  
CERTIFICATION OF REPRESENTATIVE SAMPLING

**0028**

REPUBLIC ENVIRONMENTAL SYSTEMS (OHIO) INC.	716 NORTH IRWIN	P.O. BOX 175	DAYTON, OHIO 45404	(513) 254-9990	FAX: (513) 254-3323
REPUBLIC ENVIRONMENTAL SYSTEMS (CLEVELAND) INC. (EVERGREEN ENVIRONMENTAL GROUP, INC.)	33 INDUSTRY DRIVE	BEDFORD, OHIO 44146		(216) 786-7800	FAX: (216) 786-8200

PROJECT NAME <b>Chem Lemen - ESI</b>		PROJECT LOCATION <b>Ross Oh</b>				ANALYSIS DESIRED (Indicate Separate Containers)		<div style="display: flex; justify-content: space-between;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">Fingerprint</div> <div style="border: 1px solid black; width: 100px; height: 100px;"></div> </div>				
PROJECT NO.		PROJECT CONTACT <b>Gabe Road</b>										
CLIENT REPRESENTATIVE <b>Jack Jaspers</b>		PROJECT MANAGER/SUPERVISOR										

ITEM NO.	SAMPLE LABEL	DATE	TIME	C O M P	G R A B	SAMPLE DESC. (Ind. Source)	SAMPLING EQUIPMENT	# OF SAMP.	CONT. TYPE/ VOLUME						REMARKS
1.	RES - Soil	6-16-94	9:00am	X	X	Soil from drums	Rapid Grab	1	1 pt.	X					
2.	RES - Decant H <sub>2</sub> O	6-16-94	9:45am	X		Water from drums	Glass Rod	1	1 pt	X					
3.	RES - Well Water	6-16-94	10:00am	X	X	Water from drums	Glass Rod	1	1 pt	X					

**GENERAL DIRECTIONS:** In order to determine whether we can accept the special waste described in the above numbered profile sheet, we must obtain a representative sample of the waste. We will analyze the sample to verify the information you have provided us, so it is particularly important that the sample be truly representative. In most circumstances, you will be obtaining the sample. However, in those cases in which we obtain the sample, we must ask that one of your employees be present to direct the particular source to be sampled and to witness the sampling. In such case, your employee must sign this certification as a witness.

I undersigned certifies that he/she obtained a representative sample of the waste material described in the Generator's Waste Material Profile Sheet above referenced and that the following representations are true and correct.

Signature \_\_\_\_\_

Witnessed By: \_\_\_\_\_

I hereby authorize Republic Environmental Systems, Inc. to make appropriate adjustments to the Waste Characterization Report.

Signature \_\_\_\_\_

I hereby authorize Republic Environmental Systems, Inc. to process my sample(s) and Waste Characterization Report(s) and bill my company \$ 150.00 per sample per WCR submitted. This fee represents the administrative and technical review process associated with the waste approval. It does not represent analytical fees necessary for waste identification or classification.

Signature \_\_\_\_\_

TRANS. NO.	TRANSFERS RELINQUISHED BY:	DATE	TIME	TRANSFERS ACCEPTED BY:	DATE	TIME
1.	Tom Schaffner	6-16-94	10:25am	Jack Jaspers	6-16-94	10:25am
2.						
3.						

Billing Address: \_\_\_\_\_

Broker/Invoicing: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Authorized Personnel: \_\_\_\_\_



March 13, 1995

RECEIVED  
MAR 21 1995

SITE ASSESSMENT SECTION

Ms. Augusta Wills  
Federal Facilities Enforcement Office  
U.S. Environmental Protection Agency  
401 M Street, SW (Mail Code 2261)  
Washington, DC 20460

Reference: EPA Contract No. 68-W4-0004, Work Assignment No. R11003  
Hazardous Waste Compliance Docket Study

Subject: Minutes of the February 15 and 16, 1995 Conference on the Federal Facilities  
Hazardous Waste Compliance Docket

Dear Ms. Wills:

PRC Environmental Management, Inc. (PRC) has enclosed the minutes of the February 15 and 16, 1995 conference on the Federal Facilities Hazardous Waste Compliance Docket for your review and comment.

If you have any questions about the enclosed minutes, please call me at (703) 556-2470.

Sincerely,

A handwritten signature in cursive script that reads "Maria Gilbreath".

Maria Gilbreath  
PRC Work Assignment Manager

Enclosure

cc: Jean Rellins, EPA Contracting Officer (letter only)  
Tom Sharp, EPA Project Officer (letter only)  
Mark Johnson, PRC Program Manager (letter only)  
Participants  
PRC Contract File

**Federal Facilities Hazardous  
Waste Compliance Docket Conference  
Chicago, Illinois  
February 15 and 16, 1995**

**Conference Minutes**

**Participants:** Augusta Wills, EPA HQ  
Nancy Smith, EPA Region 1  
Helen Shannon, EPA Region 2 (by telephone)  
Robert Pope, EPA Region 4  
Alan Altur, EPA Region 5  
Alan Gebien, EPA Region 5  
Jeanne Griffin, EPA Region 5  
William Messenger, EPA Region 5  
Vickie Clarrey, EPA Region 7  
Vera Moritz, EPA Region 8 (by telephone)  
Mark Ader, EPA Region 10 (by telephone)  
Monica Lindeman, EPA Region 10  
Sandy Agnagstopolous, PRC Environmental Management, Inc.  
Cheryl Finnegan, PRC Environmental Management, Inc.  
Maria Gilbreath, PRC Environmental Management, Inc.  
Theo Joyner, RGMA

The United States (U.S.) Environmental Protection Agency (EPA) held the first annual conference on the Federal Facilities Hazardous Waste Compliance Docket on February 15 and 16, 1995 at the offices of EPA Region 5 in Chicago, Illinois.

**February 15, 1995**

Ms. Wills opened the meeting by stating that the objective of the conference was to bring the Regional docket coordinators together to share information and ideas. She stated that, although this was the first time that a conference of this nature had occurred, if it should prove successful, others would be scheduled. Ms. Wills said she understands that the docket update is not the greatest part of any given Regional docket coordinator's job. In addition, the perception on the Regional level has been that the docket is not taken seriously; this perception may have arisen because the publication of docket update number 9 is more than one year late. EPA Headquarters (HQ) hopes that the update will be published in March 1995. In addition, EPA HQ is sending a message to the Regions that the docket updates should be taken more seriously. Ms. Wills added that a greater emphasis will be placed on the docket repositories, which provide the public with more information about facilities listed on the docket.

The first issue discussed was the integration of the docket with the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS). It was suggested that the



docket be eliminated and only CERCLIS used. The group noted that the difference between the two systems is that CERCLIS lists sites, while the docket lists facilities. Most Regions oppose the integration of the docket and CERCLIS for various reasons. A representative of one Region stated that, because CERCLIS may be moving sites that have the status of no further remedial action planned (NFRAP) to a "historical" database and because the NFRAP information on the docket comes from CERCLIS, integration of the two systems would eliminate the NFRAP designation. If the two systems are integrated, it would be necessary to request the NFRAP information separately. In addition, the public must know about hazardous wastes at Federal facilities in their communities to protect themselves. Communities should know about sites that have the status of NFRAP and the level to which such sites have been cleaned up. This information is especially important when land of Federal facilities is transferred to local jurisdictions, so that any restrictions on land use necessary under such circumstances can be imposed. Further, publication of the docket cannot be avoided because it is required under the law. The speaker added that there is need to examine all the information to identify any liability issues.

Ms. Wills asked about the feasibility of "linking" the docket and CERCLIS, rather than integrating the two systems. The docket then would function like the National Priorities List (NPL), which is a subset of CERCLIS. Representatives of some Regions stated that linking the systems would be too time-consuming. Some also believed that, when all sites on the docket are added to CERCLIS, some small-quantity generators (SQG) may be included erroneously. A single list should be available to communities, they stated.

A representative of one Region said that many facilities are removed from the docket because they actually are private sites (formerly used defense sites [FUDS] transferred to private ownership and later cleaned up by the U.S. Army Corps of Engineers [USACE]) or part of another facility (sites aggregated to an NPL site). Often the lines are blurred, as is the case in the western U.S. in which property formerly owned by the U.S. Navy was transferred to private ownership (to native corporations in Alaska), or mining lands in national forests were transferred from the jurisdiction of the Forest Service to private ownership, or lands under the jurisdiction of the Bureau of Land Management were leased to other Federal agencies. The speaker added that many sites in national forests are not contiguous, and, therefore, the various parcels are not considered parts of the same site. Therefore, a national forest cannot be listed as a single facility, because a separate preliminary assessment (PA) is required for each site. Performance of a PA requires from 120 to 400 hours, the speaker noted; if such uncontiguous sites were treated as a single site, the hours and dollars needed for the PA would be underestimated. A participant pointed out that affected targets may determine whether several sources of a hazardous substance in proximity to each other and located within the geographic jurisdiction of a single Federal agency could be treated as one site. In the case of a national forest, where sites are in different watersheds, affected targets become another determining factor in the decision whether such sites can be treated as individual PA sites, the speaker added.

A representative of a Region explained that funding is different for Federal facilities than for non-Federal ones, since Federal facilities that are not on the NPL do not receive high priority for funding. In addition, the speaker observed that, if the docket were integrated with CERCLIS, the need for funding might increase.

A discussion of methods of eliminating the mini-docket ensued. Each Region-specific section of the docket is considered a mini-docket. CERCLIS does not contain sufficient data to allow elimination of the docket. Different contractors maintain the various databases that are used to update the docket.

Some participants believed the information in the mini-docket is not current and often is inaccurate. Integrating the docket with CERCLIS may or may not increase inaccuracies, it was noted, depending on how the integration is carried out. It was suggested that the Regions be allowed to perform the updates, drawing upon the mini-dockets. Representatives of the Regions stated that they could complete updates more efficiently if the information to be updated were in an automated form, rather than on paper. In addition, a request was made that EPA HQ notify the Regions of an upcoming update and the deadline for completion of the update.

The Federal Facilities Compliance Manual was discussed as a guide. It was noted that the latest edition, published in 1991, was due for an update. Representatives of some Regions were not familiar with the resource, and arrangements were made to secure copies for those individuals. Docket training on a Regional level was requested. EPA HQ also requested that it be informed of any personnel changes among docket coordinators.

It was noted that some Regions cannot find the Resource Conservation and Recovery Act (RCRA) 3010 forms filed by facilities. Regions often do not receive copies of other RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) forms filed by facilities. A participant from one Region said that, in situations in which a facility's status with regard to listing on the docket is in question, good communication at all levels is essential. A PRC staff member indicated that PRC would be willing to send copies of any forms it receives to the Regions.

Mr. Theo Joyner, a representative of RGMA, asked for the group's assistance in determining whether some sites on a list he presented were in fact sites belonging to the Department of Interior (DOI). Some DOI sites could not be found because addresses were incomplete. Representatives of some Regions had ready information; others said they would respond to the request later.

Ms. Wills emphasized that listing of a facility on the docket is not considered a "black mark" against the facility. The docket is to be viewed only as a source of information. A participant asked whether documentation is needed to prove that a site is not owned by a particular Federal agency; with whom does the burden of proof lie? Ms. Wills stated that the Federal agency should work closely with the Regional docket coordinator to determine the ownership of the site.

Representatives of the Regions asked to receive the preliminary docket lists first, along with any copies of RCRA or CERCLA forms that currently are not available to the Regions, to verify and review the lists before the lists are sent to the Federal agencies. Representatives of the Regions believed that the resulting lists could be more accurate, saving later efforts to improve their accuracy. Ms. Wills will recommend that Regions receive the lists before the lists are published in the *Federal Register*, so that the Regions can make necessary changes before publication.

A suggestion was made that E-Mail or some type of network be used to automate the docket. Representatives of the Regions believed they could access information more easily and make changes online in the preliminary docket lists. The Regions then would send the information to a central location for distribution to the Federal agencies. Discussion of the feasibility of this idea centered on several requirements, including programming that accommodates easy use but offers confidentiality and an antivirus provision; determination of a low-cost mode of transmission; and resources in each Region, including upgrades of computer capacity. Ms. Wills assured the group that the idea would

be examined. Representatives of the Regions also suggested that training on procedures for updating the docket be provided to the Federal agencies.

Representatives of some Regions said that they were having difficulty determining whether some documents submitted by Federal agencies actually were preliminary assessment and site inspection (PA/SI) reports. It was pointed out that some reports were excessively voluminous and contained large amounts of information unrelated to CERCLA. It also was pointed out that such documents must follow a prescribed format and are required by law to contain certain elements. Therefore, all Federal agencies should be made aware of the information required under CERCLA and should be advised that no other information should be submitted. It then can be determined whether a PA was submitted and whether that submittal was made within 18 months of the announcement in the *Federal Register* of the facility's listing on the docket.

Because different people with different backgrounds serve as docket coordinators, it was suggested that the Regional docket coordinators help one another. Many participants agreed that, now that their counterparts in other Regions have become "familiar faces," they would be more inclined to ask for help.

A representative of a Region stated that most Regional project managers (RPM) do not like CERCLIS because it is perceived to be inaccurate, and because it is not user-friendly. In addition, there is some perception in the Regions that EPA HQ uses CERCLIS "to count beans." A representative of a Region stated that the docket is a lot easier to understand than CERCLIS. One suggestion that was well received was that a docket field be added to CERCLIS listings to indicate whether the facility is on the docket.

#### **February 16, 1995**

A representative of a Region proposed a revised process for updating the docket. The steps of the proposed method are:

Step 1 (allow two to four weeks):

- Federal agencies:
  - Additions
  - Deletions
  - Corrections
  - Submittal to Augusta Wills
- Augusta Wills and contractor (PRC):
  - Emergency Response Notification System (ERNS); CERCLA Section 103(a) data
  - CERCLIS; CERCLA Section 103(c) data
  - Resource Conservation and Recovery Information System (RCRIS); RCRA Sections 3005 and 3010 data
  - Biennial Inventory of Federal Agency Hazardous Waste Activities; RCRA Section 3016 data

- Regions:
  - Additions
  - Deletions
  - NFRAP determinations
  - Corrections
  - Submittal to Augusta Wills

Step 2 (allow two to four weeks):

- Augusta Wills and contractor (PRC):
  - Preparation of first draft of lists
  - Submittal to Regions for review and changes

Step 3 (allow two to four weeks):

- Federal agencies:
  - Contacted by Regions
  - Review of sites appearing on the first draft of the Regions' lists
- Regions:
  - Review of first draft of lists
    - In-house
    - With Federal agencies
  - Preparation of a revised version 1 of lists and submittal to Augusta Wills

Step 4 (allow two to four weeks):

- Augusta Wills and contractor (PRC):
  - Preparation of second draft of lists from Regions' revised versions 1
  - Submittal to Regions and Federal agencies

Step 5 (allow two to four weeks):

- Federal agencies:
  - Review of second draft of lists
    - EPA HQ
    - Regions
  - Preparation of a revised version 2 of lists and submittal to Augusta Wills
- Regions:
  - Review of second draft of lists
    - EPA HQ
    - Federal agencies
  - Preparation of a revised version 2 of lists and submittal to Augusta Wills

Step 6 (allow two to four weeks):

- Augusta Wills and contractor (PRC):
  - Preparation of third draft of lists from Federal agencies' and Regions' revised versions 2
  - Submittal of version 3, with copies of RCRA and CERCLA forms, to Regions before publication in the *Federal Register*
  - Submittal of version 3 to the *Federal Register* for publication

Representatives of the Regions asked to be notified in advance of the schedule for the docket update before they receive any lists to update.

A representative of one Region said that turnover among Regional docket coordinators is a problem. It was suggested that procedures be developed to ensure smooth transition and consistent training. Ms. Wills said that EPA HQ would attempt to budget for future meetings of the Regional docket coordinators. The representatives of the Regions believed that the meeting was a good opportunity to exchange ideas and experiences. They also believed it offered an opportunity to develop a rapport with those who do similar work in other Regions. It also was suggested that Trish Gowland, EPA HQ Site Assessment Program, should assist Augusta Wills with questions about sites on the docket.

The docket repositories were discussed. The repositories serve as a source of information for contractors, other agencies, and the general public. The group was reminded that the repositories exist because they are Federally mandated and that they contain all nonproprietary information pertinent to a site. The repositories, however, usually do not receive priority treatment because they are not used often.

The Regional docket coordinators asked to be consulted in any efforts to integrate the docket with CERCLIS. Ms. Wills stated that the process remains uncertain because EPA HQ has not yet determined what information should be listed in CERCLIS.

The meeting concluded with assurance by Ms. Wills that more emphasis will be placed on the importance of the docket and that additional meetings will be conducted if staff in the Regions believe they are worthwhile.